

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

TIMOTHY ALLEN TEAGAN

Case No.

Case: 2:22-mj-30476

Assigned To : Unassigned

Filed: 10/29/2022

SEALED MATTER (LH)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 17, 2022 and October 27, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
 18 U.S.C. § 922(g)(3)

*Offense Description*  
 Drug User in Possession of Firearms and Ammunition

18 U.S.C. § 922(a)(6)

False Statement in Connection with Acquisition of a Firearm.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: October 29, 2022City and state: Detroit, Michigan*Complainant's signature*Special Agent Erika Fabbro, FBI*Printed name and title**Judge's signature*Honorable Anthony Patti, U.S. Magistrate Judge*Printed name and title*

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## **AFFIDAVIT**

I, Erika Fabbro, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent assigned to the Federal Bureau of Investigation, Detroit Field Office on the Joint Terrorism Task Force as part of a Counter Terrorism (CT) Squad. I am responsible for investigating Domestic Terrorism cases (including Racially Motivated Violent Extremism, Anti-Government Extremism, Anarchist Extremism, and Militia Extremism), as well as CT Threat Assessments and Threat to Life matters. As part of my duties, I have investigated federal criminal violations involving firearms, bomb threats, and threats of violence. As a special agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.
2. On October 25, 2022, the Plymouth Police Department (PPD) advised me that Timothy Allen Teagan had been arrested by PPD for domestic violence at XXXX Cherry Street, Plymouth, Michigan (the Cherry Street residence). When officers arrived at the residence, they observed Timothy Teagan's father, Johnathan Teagan, covered in blood. He had been bitten on the forehead and repeatedly punched. After interviewing witnesses at the scene, PPD officers arrested Timothy Teagan for domestic violence.
3. I am aware that Johnathan Teagan is a convicted felon, and that his son Christopher Teagan also resides at the Cherry Street residence.
4. Johnathan Teagan advised me that he is the owner of the Cherry Street residence and that Timothy Teagan had been living in the house, but more recently has been staying at a hotel. Johnathan Teagan advised me that Timothy Teagan stores some of his possessions at the Cherry Street residence.
5. On October 29, 2022, Johnathan Teagan further advised that, although he had moved out to live in hotel rooms, Timothy Teagan spent a lot of time at the Cherry Street residence.

6. I am aware that on July 17, 2022, Timothy Teagan signed an ATF Form 4473 for the purchase of a Glock 34, 9 mm handgun. When signing the form, he certified that the information provided was accurate under penalty of prosecution. On the form, Timothy Teagan denied being a drug user, answering “no” to question 21.E on the form, which states: “*Are you an unlawful user of or addicted to, marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance? Warning: The use or possession of marijuana remains unlawful under Federal law regardless of whether it has been legalized or decriminalized for medicinal or recreational purposes in the state where you reside.*”
7. Timothy Teagan purchased a Glock 34, 9 mm pistol, serial number HWF867 on July 20, 2022.
8. On October 25, 2022, Christopher Teagan told PPD officers that there were at least three guns located within the Cherry Street residence.
9. Johnathan Teagan advised that the firearms were stored within a locked safe, and that he does not have access to the firearms because the keys to the safe are maintained by his two sons. Johnathan Teagan further advised that in the past, he has asked Timothy Teagan to remove the firearms from the premises, but Timothy Teagan refused to do so.
10. On October 27, 2022, I participated in the execution of a federal search warrant for the Cherry Street residence. Most of the items seized were found within a room Johnathan Teagan identified as containing Timothy Teagan’s possessions. Agents seized an AR-15 rifle (a Diamondback Arms, Inc. DB-15 .556 caliber semi-automatic rifle) from the bed, dozens of rounds of both rifle and 9 mm ammunition, multiple AR and 9mm magazines, an ACOG rifle sight and rifle stock fore-grip, multiple containers of what appears to be marijuana, a large bong, dozens of smaller bongs, and other drug paraphernalia, and a grinder frequently used to grind whole leaf marijuana.



11. Agents observed among Timothy Teagan's possessions a plate carrier vest, Level IV body armor, Boogaloo movement flags and patches, and gas masks.
12. Timothy Teagan's Glock 34, 9 mm handgun was also seized from Christopher Teagan's vehicle after Christopher Teagan consented to the search of his vehicle.
13. I am also advised by Interstate Nexus ATF Special Agent Michael Jacobs that the Diamondback Arms, Inc. DB-15 .556 caliber semi-automatic rifle and the Glock 34, 9 mm pistol, were manufactured outside the state of Michigan, and thus traveled in interstate or foreign commerce.
14. On October 27, 2022, Christopher Teagan advised me that on October 26, 2022, after Timothy Teagan had been released from custody (on bond for the

domestic violence arrest), Christopher Teagan brought his brother clothing and “*a ton of weed.*”

15. On October 27, 2022, Timothy Teagan advised FBI agents that he is a marijuana user, that he has been trying to cut back, and that his brother Christopher Teagan brought marijuana to him the day prior, but he had not used it yet.
16. Timothy Teagan has been arrested several times but has no criminal convictions. He has a history of assault and domestic violence, particularly against his father and brother; including while Timothy Teagan was a juvenile.
17. His first reported arrest was for assault and domestic violence in 2014, when he was a juvenile.
18. Timothy Teagan was arrested by PPD on April 16, 2017, for possession of marijuana following a traffic stop. The arrest was prosecuted in the 35th District Court of Michigan, and it appears the case may have been dismissed.
19. Timothy Teagan was arrested by the PPD for assault with a dangerous weapon (felonious assault) and domestic violence on June 30, 2017. During the assault, Timothy Teagan bit and broke the skin of his father’s arm and held a sword to his throat threatening him. Timothy Teagan also physically assaulted his brother, chased him with a sword, shot at him with an airsoft gun, and repeatedly stabbed holes in the refrigerator with the sword. He pleaded guilty, but all charges were later dismissed as part of a deferred disposition.
20. On March 12, 2022, police were dispatched to the home of Timothy Teagan’s friends, who alleged that following a political argument, Timothy Teagan punched his friend in the head three times with a closed fist and kicked his friend’s wife in the face. Timothy Teagan also threatened to shoot up their house with his AR-15 if they called the police. Attempts to locate

Timothy Teagan were unsuccessful, and the complainants refused to press charges so no charges were brought and Timothy Teagan was not arrested.

21. I am aware that Timothy Teagan self-identifies as a member and supporter of the Boogaloo movement. I believe that possession of firearms is consistent with the ideology espoused by members of this movement. I am aware that Boogaloo ideology is an anti-government or anti-authority concept advocating the violent overthrow of government.
22. On April 4, 2021, Timothy Teagan admitted in a video recording at a Boogaloo-led protest to being a user of marijuana, which would make him prohibited from possessing a firearm or ammunition under federal law. This video was publicly available on the News2Share ([www.news2share.com](http://www.news2share.com)) website, showcasing the Boogaloo members protesting outside the Ann Arbor Justice Center in Ann Arbor, Michigan. Timothy Teagan is pictured holding an AR-15 style rifle, with a partially clear sided magazine inserted into the rifle, allowing the viewer to see ammunition present in the magazine. While holding the loaded firearm, Timothy Teagan made the following declaration admitting his use of “weed”: *“I love this city. I smoke plenty of weed in this city, believe me. Been to hash bashes before.”*



23. I believe that Timothy Teagan has been a user of marijuana for many years. According to his brother, Christopher Teagan, Timothy Teagan has been



smoking “pot” since he was seven years old. Christopher Teagan later advised that Timothy Teagan smokes marijuana 4 to 5 time per day.

24. Johnathan Teagan advised me that Timothy Teagan can’t handle his liquor, but that marijuana doesn’t seem to affect him. Johnathan stated that he was unable to tell when Timothy Teagan was high, because he is always high.
25. I also believe Timothy Teagan was a regular user of marijuana from April 2021 through October 27, 2022, including on July 17, 2022, when he submitted the ATF Form 4473 for the purchase of a firearm and certified that he was not a controlled substances user or addict. The basis of this belief includes the following:
  26. I am aware that Timothy Teagan was arrested for possession of marijuana in April 2017, and that in April 2021, Timothy Teagan openly discussed his current and former marijuana use when he stated that he smoked “*plenty of weed*” in Ann Arbor and acknowledged he had previously been to “*hash bashes*”. I am aware that on October 26, 2022, after Timothy Teagan had been released from custody, Christopher Teagan brought his brother “*a ton of weed.*” And on October 27, 2022, (the day the AR-15 and Glock handguns were seized by FBI), Timothy Teagan admitted that he is a marijuana user, that he’s been trying to cut back, and that his brother brought him marijuana the day prior (but he had not used it yet).
  27. In addition, on October 27, 2022, FBI agents seized multiple packages containing what appears to be marijuana, a large bong, and dozens of smaller bongs, and drug paraphernalia from the room Timothy Teagan used to store his possessions in his father’s home.

### **CONCLUSION**

28. Based on the foregoing, I believe that there is probable cause to believe that Timothy Teagan violated the federal firearms statute 18 U.S.C. § 922(g)(3), which makes it a crime for a drug user or addict to possess firearms or ammunition. ATF Regulation Title 27, Code of the Federal Regulations

(CFR), Section 478.11 specifically defines the terms, “unlawful user of” or “addicted to any controlled substance” as “A person who has lost the power of self-control with reference to the use of a controlled substance; and any person who is a current user of a controlled substance in a manner other than prescribed by a licensed physician.”

29. Finally, I submit there is probable cause to believe that Timothy Teagan violated 18 USC § 922(a)(6), False Statement in Connection with Acquisition of a Firearm by making a false written statement on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record stating that he was not a user of, or addicted to any controlled substances, when in fact as the defendant then knew, he was a user and/or addict of a controlled substance.



Erika Fabbro, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



HONORABLE ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

Date: October 29, 2022